

To: kaz danesh <cancunkaz@hotmail.com>
Cc: Christopher Moser <cmoser@qlslwm.com>; Rod Khavari <rodk@dfwlawgroup.com>; Ashley Hill <Ashley.Hill@padgettlawgroup.com>
Subject: RE: Subject: RE: GRC Dallas 19-41186 / 6012 Mayes Place & 1005 Shady lane north keller

I will advise them of your message below. If you do not intend to make any additional plan payments, please let me know, so that we may proceed accordingly. Thanks.



Kim Moses Linden
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Dallas, Texas 75240
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(850) 422-2567 Fax
Kim.Linden@Padgettlawgroup.com
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**Licensed in Texas & Louisiana*

Escalation Contact: Keena Newmark, Managing Attorney Bankruptcy, Keena.Newmark@Padgettlawgroup.com

From: kaz danesh <cancunkaz@hotmail.com>
Sent: Tuesday, December 29, 2020 4:57 PM
To: Kim Linden <Kim.Linden@padgettlawgroup.com>
Cc: Christopher Moser <cmoser@qlslwm.com>; Ashley Hill <Ashley.Hill@padgettlawgroup.com>; Rod Khavari <rodk@dfwlawgroup.com>
Subject: Re: Subject: RE: GRC Dallas 19-41186 / 6012 Mayes Place & 1005 Shady lane north keller

Thanks Kim, but ive been waiting over 3 months for these from your office and over 2/3 weeks from requesting them from statebridge, statebridge foreclosure and statebridge bankruptcy
Ive already incurred damages and expenses and I have previously authorized my state litigation attorney to send out a notice for DTPA which statebridge should be receiving shortly and to file suit

On Dec 29, 2020, at 4:50 PM, Kim Linden <Kim.Linden@Padgettlawgroup.com> wrote:

Mr. Danesh, please find attached the requested payoffs. Please also note that the loans are due for 11/01/2020, which means you are 60 days behind on plan payments, and January payments will be due next week. Please advise when these payments will be made.
Thanks.

<image001.png>

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Escalation Contact: Keena Newmark, Managing Attorney Bankruptcy, Keena.Newmark@Padgettlawgroup.com

From: kaz danesh <cancunkaz@hotmail.com>
Sent: Monday, December 21, 2020 6:02 PM

To: Kim Linden <Kim.Linden@padgettlawgroup.com>
Subject: Re: Subject: RE: GRC Dallas 19-41186 / 6012 Mayes Place & 1005 Shady lane north keller

Kim,
Checking in to see if you have received payoff from statebridge

On Dec 14, 2020, at 9:48 AM, kaz danesh <cancunkaz@hotmail.com> wrote:

Kim just doing a weekly checkin. I didnt hear from you below. Im hoping you have the payoff.

Hi Kim just checking in with you again on this, coming up on 6 weeks though no fault of your own I understand but I'd really like to see if we can get these payoffs and try to start moving into some settlement talks

As you can see by the motion that was filed by one of the unsecured creditors they're trying to get a disbursement but Im trying to get your client settled before dealing with unsecured creditors just in case my company goes into chapter 7 before the 5 years (we are at year one)

I just sold a house and Had 313,000 as per the motion in the Plan Agents account
I'm down to around 250k now after paying expenses for GRC which We can confirm that thru the PA when settlement talks start so your client knows exactly

Please see if you can get the payoffs asap, make sure they are at the 5.5% and see if we can move on to trying to get these settled so your client can be done with this BK and the wait at such a low interest rate when they are used to getting double that via their hard money.

Please let me know

On Nov 30, 2020, at 11:40 AM, Kim Linden <Kim.Linden@padgettlawgroup.com> wrote:

Thanks, I haven't gotten the reapplication yet, but will continue to work to obtain those current payoff numbers.

From: kaz danesh <cancunkaz@hotmail.com>
Sent: Monday, November 30, 2020 8:02 AM
To: Kim Linden <Kim.Linden@padgettlawgroup.com>
Cc: Christopher Moser <cmoser@qslwm.com>; Ashley Hill <Ashley.Hill@padgettlawgroup.com>; joyce@joycelindauer.com
Subject: Re: Subject: RE: GRC Dallas 19-41186 / 6012 Mayes Place & 1005 Shady lane north keller

Hi Kim,
Hope you had a good holiday week Just checking in on the above payoffs and accounting to make sure accurate in hopes of coming to a mutual agreement
Please let me know

On Nov 16, 2020, at 1:54 PM, Kim Linden <Kim.Linden@padgettlawgroup.com> wrote:

Mr. Daneshmandi,

Thank you for your inquiry. I am working on the payoffs - every time they are prepared another payment is made. I am hoping to get those updated numbers to you this week.

With respect to settlement, if you would like to propose an offer I will certainly forward it to Statebridge, otherwise, continued payment under the plan is preferred.

Also, below you stated that "[p]er my plan I am paying 5% interest on these notes". Please note that the plan provides for interest on both properties to be paid at 5.5%. See Docket No. 140, Sections 3.08(b) and 3.09(b).

Please let me know if you have any additional questions or concerns.

<image001.png>

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Escalation Contact: Keena Newmark, Managing Attorney Bankruptcy,
Keena.Newmark@Padgettlawgroup.com

From: kaz danesh <cancunkaz@hotmail.com>
Sent: Monday, November 16, 2020 1:30 PM
To: Kim Linden <Kim.Linden@padgettlawgroup.com>
Cc: Christopher Moser <cmoser@qlwm.com>; Ashley Hill <Ashley.Hill@padgettlawgroup.com>
Subject: Re: Subject: RE: GRC Dallas 19-41186 / 6012 Mayes Place & 1005 Shady lane north keller

Hi Kim,
I was writing to see if your client has any interest in settling this matter as my previous email asked.
As well I would like to get a payoff for the 2 outstanding loans good for 30 days so that I can make sure the terms of the plan are outlined in the interest rate.
Can you let me know on the above

Thanks

On Sep 30, 2020, at 4:35 PM, Kim Linden <Kim.Linden@padgettlawgroup.com> wrote:

Mr. Daneshmandi,

I am in receipt of your communication below and have forwarded your request to Statebridge.

I understand the terms of the confirmed plan and GRC's obligations with respect to same. The reference to a six month period to sell the properties, I believe, arose in between prior counsel's communication on curing the first post-confirmation plan payment delinquencies, but I was unable to confirm the offer was ever accepted by both sides.

I will let you know as soon as I hear anything, if Statebridge is interested in discussing your below proposal any further. Thank you.

<image001.png>

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Escalation Contact: Keena Newmark, Managing Attorney Bankruptcy,
Keena.Newmark@Padgettlawgroup.com

From: kaz danesh <cancunkaz@hotmail.com>
Sent: Wednesday, September 30, 2020 11:15 AM
To: Kim Linden <Kim.Linden@padgettlawgroup.com>

Cc: Chris Moser <cmoser@qslwm.com>
Subject: Subject: RE: GRC Dallas 19-41186 / 6012 Mayes Place & 1005 Shady lane north keller

Hi Kim,
My name is Kazem Daneshmandi and am owner of GRC which is in BK protection under my plan

As per your email below you state that there is a 6 month plan or agreement that the properties would be marketed or sold. There is no such language in my plan and was not part of my plan. Please coordinate with statebridge that I am planning on taking the entire 5 years of restructuring to get these properties rehabbed and sold. Per my plan I am paying 5% interest on these notes. I know statebridge services or sells these notes off for significatinaly higher rate so these have and will become and stay losses for their investors and statebridge

Im reaching out today to see if your client would like to settle the claims for a reduced settlement fee of the payoffs so that their money doesnt have to be paid in 5 years and can be made as close to whole as possible. I will need a significant settlement proposal for me to work with my PA to settle these properties with GRC funds in my DIP acct

Statebridge for years overcharged me on interest and points as well as junk fees and has withheld considerable amounts that are due back to me that they make clients jump thru hoops to regain I would like to put the statebridge chapter behind me but in no means am I willing to just settle for anywhere near what a current payoff would be at 5% Please generate a payoff good for 60 days out which should give both of us time to settle this debt if your client chooses. Please forward the payoff so that we can make sure the accounting is correct on it per the plan and judges orders. Please ensure that the % being charged is the lower amount and has been for the last year and that the additional money in the payment is being credited to principal Please send a detailed accounting report Then please coordinate with your client on an offer they would like to present to GRC at that point I will talk to the PA Chris Moser and see what funds are avail to settle one or both if the terms are acceptabke. Please be advised that my DIP acct has approx 200k in it and am hoping for a non state bridge house to sell in the next 60 days which will give me more money to settle. As noted above I am not planning on selling the statebridge houses for up to 5 years

Thanks. Any questions please email

From: Kim Linden <Kim.Linden@padgettlawgroup.com>
Sent: Monday, July 13, 2020 1:55 PM
To: cmoser@qslwm.com; Joyce Lindauer
<joyce@joycelindauer.com>
Subject: RE: GRC Dallas 19-41186 / 6012 Mayes Place & 1005 Shady Lane North

Good afternoon, I'm just following up on the below.
Statebridge has informed me that Chris has submitted payment for July, but should we be expecting payment from the Debtor for the other plan payments? Also is the Debtor going to provide proof of insurance.

Thanks, and hope all is well.

<image001.png>

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Escalation Contact: Keena Newmark, Managing Attorney
Bankruptcy, Keena.Newmark@Padgettlawgroup.com

From: Kim Linden
Sent: Wednesday, June 24, 2020 4:35 PM
To: cmoser@qslwm.com; joyce@joycelindauer.com
Subject: GRC Dallas 19-41186 / 6012 Mayes Place & 1005
Shady Lane North

Chris / Joyce,

Hope all is well. I am following up on the prior communications with Bruce Akerly regarding the debtors plan payments in this post-confirmation case.

The Plan states that Debtor will be making these payments, but it seems like Chris might also be disbursing, so I am including both of you. The Debtor has not made any additional payments under the plan, and has yet to provide Statebridge with proof of insurance on these properties. In addition, Statebridge is requesting an update on the Debtor's marketing efforts or listing of the properties pursuant to the agreement that this would be done within six months.

See attached Notices of Default. You will also receive the appropriate copy by mail. Please let me know if you think this matter can be resolved.

Thanks so much.

<image001.png>

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Escalation Contact: Keena Newmark, Managing Attorney
Bankruptcy, Keena.Newmark@Padgettlawgroup.com

From: Christopher Moser <cmoser@qslwm.com>
Sent: Tuesday, February 11, 2020 10:47 AM
To: Bruce Akerly <bakerly@akerlylaw.com>
Cc: joyce@joycelindauer.com; Kimberly Hill
<kimhill@qslwm.com>
Subject: GRCDallas

Bruce,

On Thursday of last week I received the funds from the DIP account and deposited the funds into my account. I can now start making plan payments. Please verify that your client is owed 2 months of payments. Do you want the payments made to your client or to you.

Chris

Christopher J. Moser | Chapter 7 Trustee | Attorney
Board Certified Business Bankruptcy Law and Consumer
Bankruptcy Law

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<39786_GRC Dallas Homes LLC_1005 Shady Lane North_payoff gtd 12.31.2020.pdf>

<39726_GRC Dallas Homes LLC_6012 Mayes Place_payoff gtd 12.31.2020.pdf>

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